

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHUN-KO CHANG, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

SHEN YUN PERFORMING ARTS, INC., FEI  
TIAN COLLEGE, FEI TIAN ACADEMY OF  
THE ARTS, DRAGON SPRINGS  
BUDDHIST INC., INTERNATIONAL BANK  
OF CHICAGO, SHUJIA GONG A/K/A  
TIANLIANG ZHANG, HONGZHI LI, AND  
RUI LI,

Defendants

Civil Action No.: 7-24-CV-8980 (PMH)

**DECLARATION OF KRISTINA  
RELIFORD IN SUPPORT OF  
MOTION TO WITHDRAW AS  
COUNSEL**

I, Kristina Reliford, pursuant to 28 U.S.C. § 1746, and subject to the penalty of perjury, declare that the following is true and correct:

1. On November 25, 2024, Plaintiff filed her Complaint. On January 8, 2025, I filed my appearance as counsel for Defendants Hongzhi Li and Rui Li (the “Lis”) and concurrently filed for an extension of the Lis’ time to respond to the Complaint, while preserving all arguments concerning the validity of service on the Lis.

2. The Court granted that request, which extended the Lis’ deadline to respond to the Complaint to February 19, 2025.

3. At all times, I have faithfully represented the Lis and worked diligently and efficiently, advocating, respecting, and preserving all rights and defenses, and ensuring all deadlines were maintained.

4. The reason for my request to withdraw is that the Lis have retained substitute counsel who will be taking over their representation. This request is not being made to prejudice

the rights of Plaintiff or any other party.

5. I anticipate that substitute counsel will need and promptly seek an extension of the Lis' current deadline for responding to the Complaint.

6. The Lis consent to and have requested that I withdraw as their counsel in this action.

7. Going forward, I do not anticipate having any involvement in this action and respectfully request that I be removed from the docket and ECF distribution list.

Dated: February 6, 2025

/s/Kristina Reliford

Kristina Reliford